

## **ATTACHMENT L**

---

### **CULTURAL RESOURCES MONITORING REPORT**

Legal description: T 1N, R 2W, Sec. 27  
County: Multnomah  
USGS quad: Sauvie Island, OR  
Project Acreage: ~3 ac  
Acres Monitored: ~1.5 ac  
Findings: -  
Fieldnotes: WillametteCRA  
Curation: None

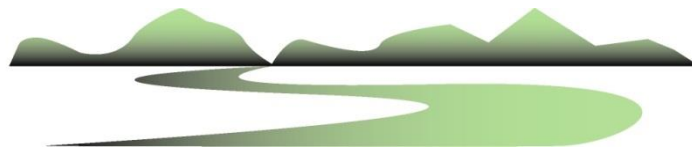
**Archaeological Monitoring for the Riverbank Stabilization Project  
at Evraz Oregon Steel Mill's Rivergate Facility  
Portland, Multnomah County, Oregon**

Prepared by:  
Daniel M. Gilmour, M.A., R.P.A.  
and David V. Ellis, M.P.A.

October 19, 2015

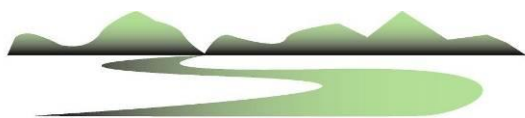
Prepared for:  
Evraz Oregon Steel Mill and Integral Consulting, Inc.  
Portland, Oregon

**Willamette Cultural Resources Associates, Ltd.**



Portland, Oregon

**WillametteCRA Report Number 15-01**



---

## **TECHNICAL MEMORANDUM**

Archaeological Monitoring for the Riverbank Stabilization Project  
at Evraz Oregon Steel Mill's Rivergate Facility  
Portland, Multnomah County, Oregon

Prepared by:  
Daniel M. Gilmour, M.A., R.P.A.  
and David V. Ellis, M.P.A.

October 19, 2015

### **Introduction**

On behalf of Evraz Oregon Steel Mill (EOS), and Integral Consulting, Inc. (Integral), Willamette Cultural Resources Associates, Ltd. (WillametteCRA), conducted archaeological monitoring of ground-disturbing activities related to the Riverbank Stabilization Project (project) at EOS's Rivergate Facility (facility). The project area is located in Section 27, Township 1 North, Range 2 West, Willamette Meridian (Figure 1). The facility is on the right (eastern) bank of the Willamette River in north Portland, from approximately River Mile 2.0 to 2.5. EOS has implemented an interim remedial measure that addresses provisions of the June 2000 Voluntary Remedial Investigation Source Control Measures Agreement between the Oregon Department of Environmental Quality (DEQ) and EOS (DEQ 2000) for cleanup activities related to the Portland Harbor Superfund Site. As the project required obtaining authorization under a Section 10 permit from the U.S. Army Corps of Engineers (USACE), the project falls under the purview of Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800).

The EOS facility lies in an area that constituted the historic floodplain between the Willamette and Columbia rivers prior to development. The property is surrounded by industrial manufacturing and transfer facilities to the north, south, and east. The Willamette River forms the western boundary of the property. The facility covers an area of approximately 145 acres. Approximately three of these acres constitute the project area. This area extends across roughly 1,720 linear feet of riverbank.

---

The project consists of the removal of contaminated soil on the riverbank surface, capping the underlying material, and stabilizing the remediated riverbank with an armored slope, cap, and riparian vegetation. Heavy equipment executed the removal and stabilization activities. These measures provide environmental benefits by removing, capping, stabilizing, and preventing future releases of contaminants. The project is also designed to restore and enhance riverbank habitat.

### **Archaeological Background**

In 2008, Willamette Cultural Resources Associates, Ltd. (WillametteCRA) conducted an archaeological and historic resources survey (survey) for the entire riverbank area between the northern and southern property boundaries of the EOS facility (Ellis 2008). In that report, Ellis provided extensive background information on the project area to include land-use history, Native Peoples, and previous archaeology in the area. The reader is referred to Ellis's report for contextual information on the project and the area's cultural history.

Ellis' survey found no evidence of cultural resources in the project area. In general, the survey indicated a relatively low potential for archaeological or historical resources at the project location as much of the present shoreline has been created through filling over the past 50 years. The northern project area, however, more closely corresponds with the historical shoreline. In addition, there is a report from an artifact collector (Strong 1967:26, 31) of a precontact archaeological site in the general vicinity of the project (this report may date to the early 1900s). As a precautionary measure, Ellis therefore recommended the preparation of an archaeological monitoring protocol and periodic archaeological monitoring where native soil could be disturbed (the monitoring area) as depicted in Figure 2 of this report. The monitoring area is the northern portion of the project location that coincides with the historic alignment of the riverbank.

WillametteCRA subsequently prepared an inadvertent discovery plan and archaeological monitoring protocol for the project (WillametteCRA 2015). The current monitoring was conducted in accordance with the procedures set forth in that document. A copy of the plan/protocol is provided in the appendix.

### **Results of Archaeological Monitoring**

WillametteCRA archaeologists Daniel Gilmour, M.A., R.P.A., Kanani Paraso, M.A., R.P.A., and Breanne Taylor, B.A., monitored construction when ground-disturbing activities occurred in the monitoring area. All three monitors had completed and are current for the 40-hour HAZWOPER certification. Construction activities within the monitoring area occurred intermittently from July to September 2015 (Table 1). Construction actions consisted of the mechanical removal of the existing berm (that essentially serves as a levee) and riverbank

Table 1. Summary of Archaeological Monitoring.

Date	Monitor	Findings
7/13/2015	Kanani Paraso	No cultural material observed
7/27/2015	Kanani Paraso	No cultural material observed
7/28/2015	Daniel Gilmour	No cultural material observed
8/3/2015	Daniel Gilmour	No cultural material observed
8/4/2015	Daniel Gilmour	No cultural material observed
8/5/2015	Daniel Gilmour	No cultural material observed
8/6/2015	Daniel Gilmour	No cultural material observed
8/11/2015	Daniel Gilmour	No cultural material observed
8/13/2015	Daniel Gilmour	No cultural material observed
8/17/2015	Breanne Taylor	No cultural material observed
8/25/2015	Daniel Gilmour	No cultural material observed
8/26/2015	Daniel Gilmour	No cultural material observed
8/31/2015	Kanani Paraso	No cultural material observed
9/1/2015	Daniel Gilmour	No cultural material observed
9/2/2015	Kanani Paraso	No cultural material observed

materials. Excavation was carried out using an excavator. Excavated materials were removed by truck to facilities designed to receive contaminated materials. Clean fill material was imported by truck and emplaced by excavators and a bulldozer.

Archaeologists remained at the point of excavation and observed the removal of each bucket of dirt, then inspected the ground surface. They took field notes describing the sediment and activities observed. In addition, archaeologists photodocumented the excavations in progress.

Excavated material closely resembled Ellis's (2008) observations during the initial survey for this project. The riverbank was composed of materials deposited since construction of the steel mill began in 1967 (Figures 3-4). The riverbank matrix was a haphazard combination of different proportions of dirt, slag, and large chunks of concrete. Crews occasionally encountered milled wood debris and metal objects. The beach was composed of sand and alluvial cobbles intermixed with slag, pieces of metal, and occasional brick fragments related to construction and operation of the mill (Figures 5-6). In excavations situated closer to the river, water was encountered at the base of excavations (Figure 6).

No archaeological or historical resources were observed at any time. Archaeologists did not observe any precontact or historical archaeological materials. Much of the berm and the beach consisted of modern materials deposited during construction of the steel mill or its subsequent

---

operations. Development of the mill did not occur until the late 1960s (Ellis 2008). As such, none of the modern materials qualify as an archaeological resource.

### **Conclusions and Recommendations**

At the request of Integral, WillametteCRA completed archaeological monitoring of construction excavations at the Riverbank Stabilization Project at Evraz Oregon Steel Mill's Rivergate Facility in north Portland, Oregon. There are no known archaeological sites or historic resources within the project area.

Construction activities within the monitoring area occurred intermittently from July to September 2015. Construction involved the use of excavators, a bulldozer, and dump trucks. Riverbank sediments consisted of dirt, slag, and large chunks of concrete, while beach sediments were sand and alluvial cobbles intermixed with slag, metal, and occasional brick fragments.

Archaeologists did not identify any archaeological or historical resources. Much of the riverbank and the beach consisted of modern materials deposited during construction of the steel mill or its subsequent operations. None of these materials qualify as an archaeological resource as they have only been deposited since the development of the mill in the late 1960s.

Should unanticipated archaeological or historical resources be encountered during future activities at this location, all ground-disturbing activity in the vicinity of the find should be halted and SHPO, USACE, and appropriate agencies notified immediately. In the event that evidence of human skeletal remains is encountered during future work, all ground-disturbing activity in the vicinity of the discovery should be halted immediately, efforts taken to protect such evidence in place, and SHPO, USACE, Oregon State Police, appropriate Tribes and agencies, and the Multnomah County Medical Examiner promptly notified to ensure compliance with state and federal laws.

---

## References

Department of Environmental Quality (DEQ)

2000 *Voluntary Agreement for Remedial Investigation and Source Control Measures between Oregon Steel Mills Inc. and Oregon Department of Environmental Quality*. Oregon Department of Environmental Quality, Portland.

Ellis, David V.

2008 *An Archaeological and Historic Resource Survey for the Proposed Riverbank Stabilization Project at the Evraz Oregon Steel Mill's Rivergate Facility, Portland, Oregon*. Prepared for ENSR Corporation, Seattle, Washington. Willamette Cultural Resources Associates, Ltd., Portland, Oregon.

WillametteCRA

2015 *Inadvertent Discovery Plan and Archaeological Monitoring Protocol for the Riverbank Excavation and Stabilization Project*. Prepared for Evraz Oregon Steel Mill, Portland. Willamette Cultural Resources Associates, Ltd., Portland, Oregon.







Figure 2. Aerial map of project location showing monitoring area.





Figure 3. Removal of berm materials in northernmost portion of project area between project stations 2+50 ft. to 3+50 ft., facing north.



Figure 4. Overview of excavation of riverbank near project station 7+10 ft., facing southwest. Slag and concrete deposit visible at base of excavation indicated by arrow.





Figure 5. Excavation of beach material near project station 8+50 ft., facing northeast.



Figure 6. Overview of monitoring area near project station 8+00 ft., facing southwest. Clean rock armor has been built up on the left and clean beach backfill material has been deposited on riverbank in background. Recently excavated beach is in foreground.



Figure 7. Overview of a completed section of the project. Photo from project station 2+50 ft., facing southwest.

## **Appendix**

### **Inadvertent Discovery Plan and Archaeological Monitoring Protocol for the Riverbank Excavation and Stabilization Project**

Prepared for:

**Evraz Oregon Steel**

**Portland, Oregon**

# Inadvertent Discovery Plan and Archaeological Monitoring Protocol Riverbank Excavation and Stabilization Project

Prepared for:  
**Evraz Oregon Steel**  
**Portland, Oregon**

# Inadvertent Discovery Plan and Archaeological Monitoring Protocol Riverbank Excavation and Stabilization Project

---

Prepared by  
Willamette Cultural Resources Associates, Ltd.

Contents

1.0 Background..... 1

2.0 On-Site Procedures ..... 2

    2.1 Professional Archaeologist On-Site .....2

    2.2 Discovery .....2

3.0 Confidentiality..... 4

4.0 References ..... 5

5.0 List of Figures..... 6

    Figure 1. Location Map. .... 6

    Figure 2. Portion of the proposed remediation area at which monitoring is recommended.....7

    Figure 3. Conceptual design plan. .... 8

    Figure 4. Archaeological monitoring protocol flow chart. .... 9

List of Attachments

Attachment A Contact Information for Archaeological Monitoring Protocol



## Background

Evraz Oregon Steel (EOS) has proposed implementing an interim remedial measure that addresses provisions of the June 2000 Voluntary Remedial Investigation Source Control Measures Agreement between the Oregon Department of Environmental Quality (DEQ) and EOS for cleanup activities related to the Portland Harbor Superfund Site. This measure will provide environmental benefits by removing, capping, stabilizing, and preventing future releases of contaminants. The project will also restore and enhance riverbank habitat.

The remediation consists of removal of contaminated soil on the riverbank surface, capping the underlying material, and stabilizing the remediated riverbank with an armored slope, cap, and riparian vegetation. Planned removal and fill will extend for approximately 1,720 feet along the riverbank (Figures 1-3).

In 2008, Willamette Cultural Resources Associates, Ltd. (WillametteCRA) conducted an archaeological and historic resources survey (survey) for the entire riverbank area between the northern and southern property boundaries which encompasses the riverbank excavation and stabilization area (Figure 1). In general, the survey indicated a relatively low potential for archaeological or historical resources at the project location (Ellis 2008). As a precautionary measure, the survey recommended the preparation of an archaeological monitoring protocol and periodic archaeological monitoring where native soil may be disturbed as shown in Figure 2).

While the survey indicated a relatively low potential for discovery of archaeological or historical resources, there is a possibility that archaeological resources may be encountered during project-related activity in native soil. It is important that any “discovered” human remains and associated cultural materials and deposits be treated with care and respect and protected from further disturbance and exposure to weather. This plan establishes protocols to report and process inadvertent discoveries of potential historic properties, human remains, funerary objects and other cultural items during activities undertaken at the EOS construction area.

Six Tribal governments have been identified as having an interest in the cultural resource work at the EOS Project Area. The six governments are:

- Confederated Tribes of the Grand Ronde Community of Oregon
- Confederated Tribes of Siletz Indians of Oregon
- Confederated Tribes of the Warm Springs Reservation of Oregon
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes and Bands of the Yakama Indian Nation
- The Nez Perce Tribe.

## **On-Site Procedures**

To assure compliance with Oregon archaeological and cultural resource laws (Oregon Revised Statute [ORS] 97.740 et seq., 358.905 et seq., 390.235 et seq. and Oregon Administrative Rule [OAR] 736-051-0080 to 0090), the following procedures have been developed to address potential inadvertent discoveries of cultural materials and deposits (including sacred objects, funerary objects, and objects of cultural patrimony as defined in ORS 358.905) and Indian burials and human remains (as defined in ORS 358.905) during ground-disturbing activities at the site.

### **Professional Archaeologist On-Site**

EOS has retained the services of a professional archaeologist, Willamette Cultural Resources Associates, Ltd. (WillametteCRA), as defined in ORS 97.740 and ORS 390.235(6) (b). Willamette CRA performed the survey and will provide periodic on-site monitoring when ground disturbing work in the recommended monitoring area is conducted. The portion of the proposed remediation area at which monitoring is recommended is indicated on Figure 2.

Willamette Cultural Resources will provide archeological/cultural identification orientation training for field contractors performing ground disturbing activities prior to ground-disturbing work in the proposed remediation area.

### **Discovery**

Upon discovery of a suspected archaeological object or archaeological site, a monitoring archaeologist—at his/her discretion—may slow or halt the excavation or other ground-disturbing activities. The objective of this slowing or halting of ground-disturbing activity is to allow the archaeologist to confirm and/or make a preliminary assessment of the discovery.

Should a monitoring archaeologist determine that archaeological artifacts are present and that the artifact(s) are in fill or disturbed deposits and intact archaeological deposits are absent, he or she will document the discovery through maps and photographs, then retrieve, bag, and catalog the item(s). Upon completion of the documentation and retrieval of the artifact(s), the examining archaeologist will authorize construction activity to resume.

Should a monitoring archaeologist determine that a possible significant cultural resource has been encountered, he or she will immediately notify EOS's designated representative. EOS's representative will then promptly notify the USACE, the Oregon SHPO, and the appropriate Tribes of the find and the initial findings of the examining archaeologist. The monitoring archaeologist will work with EOS's representative and EOS's contractor to determine when and where work can continue. The archaeological monitor may authorize the contractor to proceed with excavations in a different project area while further examination and assessment is made of the discovery.

At the request of the examining archaeologist, EOS will either

Assist in securing access to the location of the discovery and take appropriate measures to protect the location of the discovery from rain, stormwater, and other possible disturbances, or

Assist the archaeologist in moving the artifacts to a protected and secure area of the site away from the immediate construction area if relocation of the artifacts is appropriate or necessary.

In the event that likely or confirmed human remains are encountered, the monitoring archaeologist will be responsible for immediately notifying EOS (pursuant to ORS 97.745(4)). EOS will then notify the Oregon State Police, the Oregon State Historic Preservation Office (SHPO), DEQ, the six Tribes referenced above, the Commission on Indian Services, and the Multnomah County Medical Examiner.

Human remains and associated funerary objects shall remain in place, with minimal disturbance by the county medical examiner in completing his or her work.

Should humans or likely archaeological deposits be encountered when no monitor is present, all ground-disturbing activity within 40 feet of the discovery will be halted immediately. For the discovery of human remains, EOS will follow the procedures defined above. For finds of possible or known archaeological materials or deposits, EOS will promptly contact WillametteCRA. WillametteCRA will provide the services of a professional archaeologist to examine the reported find at the earliest opportunity. The procedures defined above for discovery when a monitor is present would then be implemented.

Figure 4 outlines and identifies the steps to be taken in the event of a potential discovery.

If the site is determined not to be a crime scene, and the human remains are identified as Native American, EOS shall continue to secure the remains and any associated funerary objects in place, until their final disposition on-site in a predetermined location. EOS shall give due consideration to and honor, to the extent possible, any request by the Tribe to leave the remains and/or other cultural items in place.

Upon completion of the Archaeological Monitoring Protocol, an area of the site will be designated as a staging area for the archaeologist and Tribal representatives to more closely examine artifacts and determine if re-burial on site or decontamination off-site is appropriate. Also, an area of the site will be identified, in consultation with the Tribes, for reburial of discovered artifacts that are contaminated, and unlikely to undergo de-contamination procedures, such as textiles and baskets. The location of this area will be known only to the Tribes, DEQ, EOS and EOS contractors working directly on the project.

## **Confidentiality**

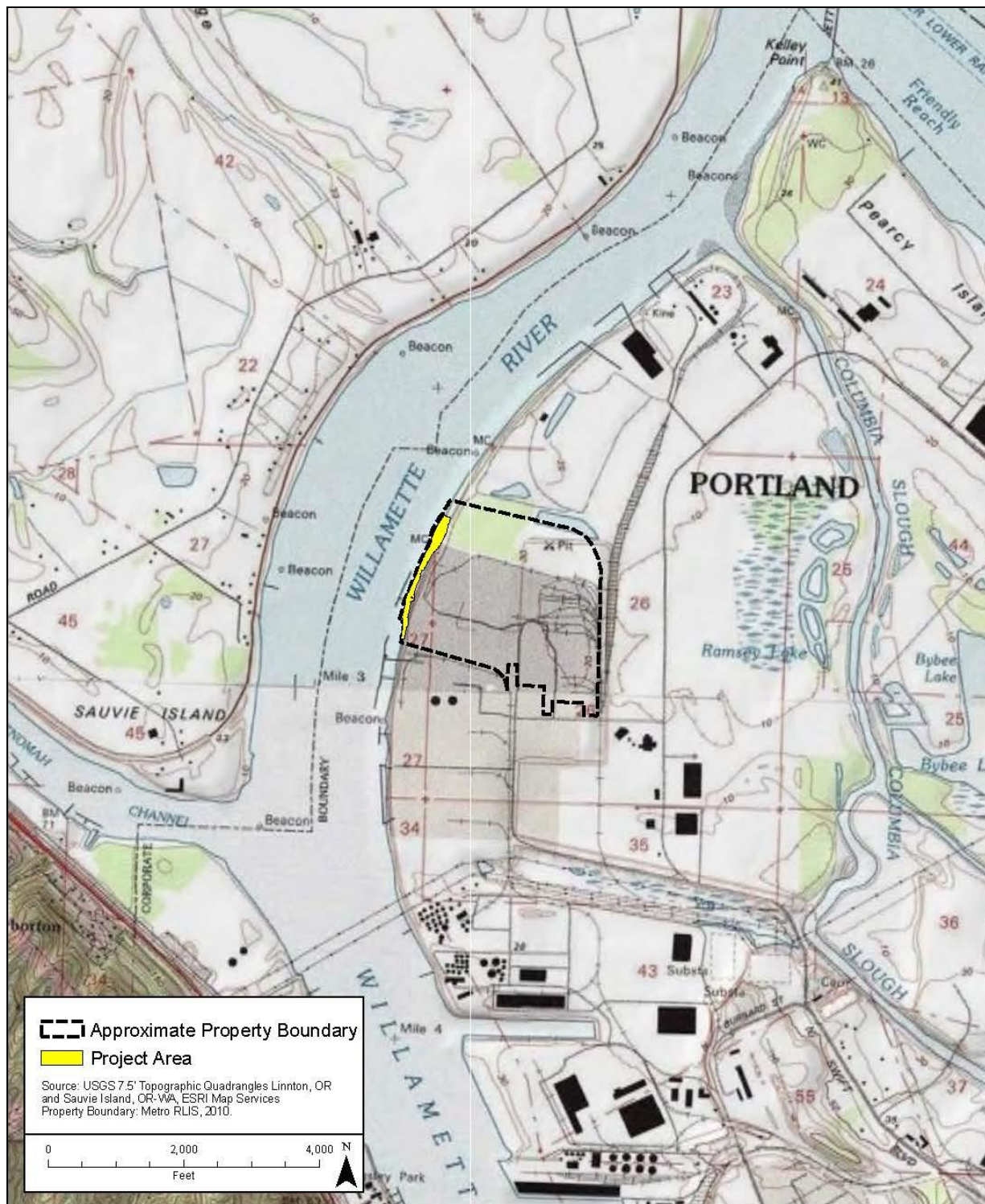
EOS shall make their best efforts, in accordance with State law, to ensure that its appropriate personnel and contractors keep the discovery of any found or suspected human remains, other cultural items, and potential historic properties confidential. Contractors and agency personnel are prohibited from contacting the media or any third party or otherwise sharing information regarding the discovery with any member of the public, and to immediately notify EOS and direct any inquiry from the media or public. Prior to any release, EOS, DEQ and the Tribes shall concur on the amount of information, if any, to be released to the public, any third party, and the media and the procedures for such a release, to the extent permitted by law.

## References

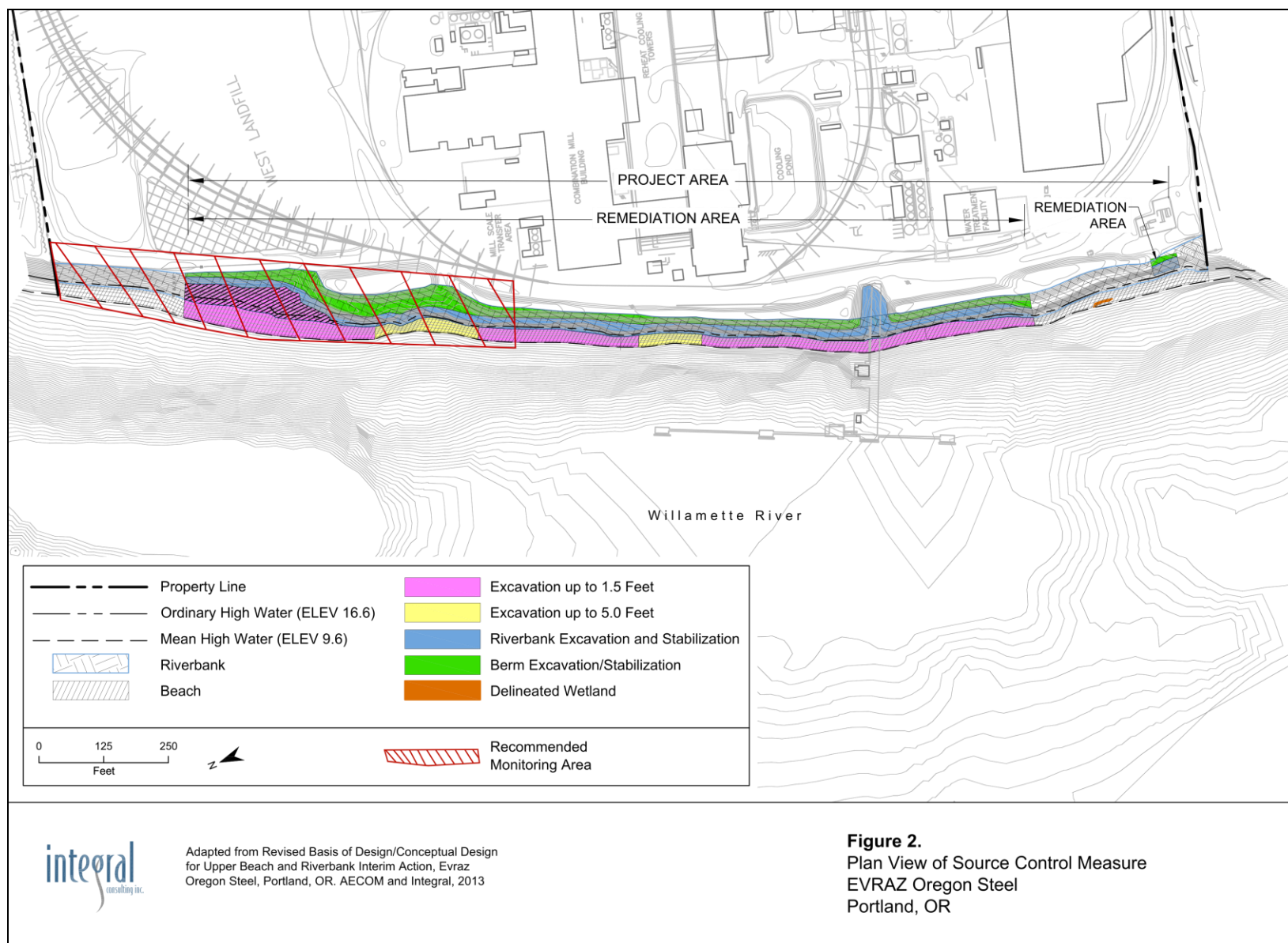
Ellis, David V.

2008 *An Archaeological and Historic Resource Survey for the Proposed Riverbank Stabilization Project at the Evraz Oregon Steel Mill's Rivergate Facility, Portland, Oregon*. Prepared for ENSR Corporation, Seattle, Washington. Willamette Cultural Resources Associates, Ltd., Portland, Oregon.

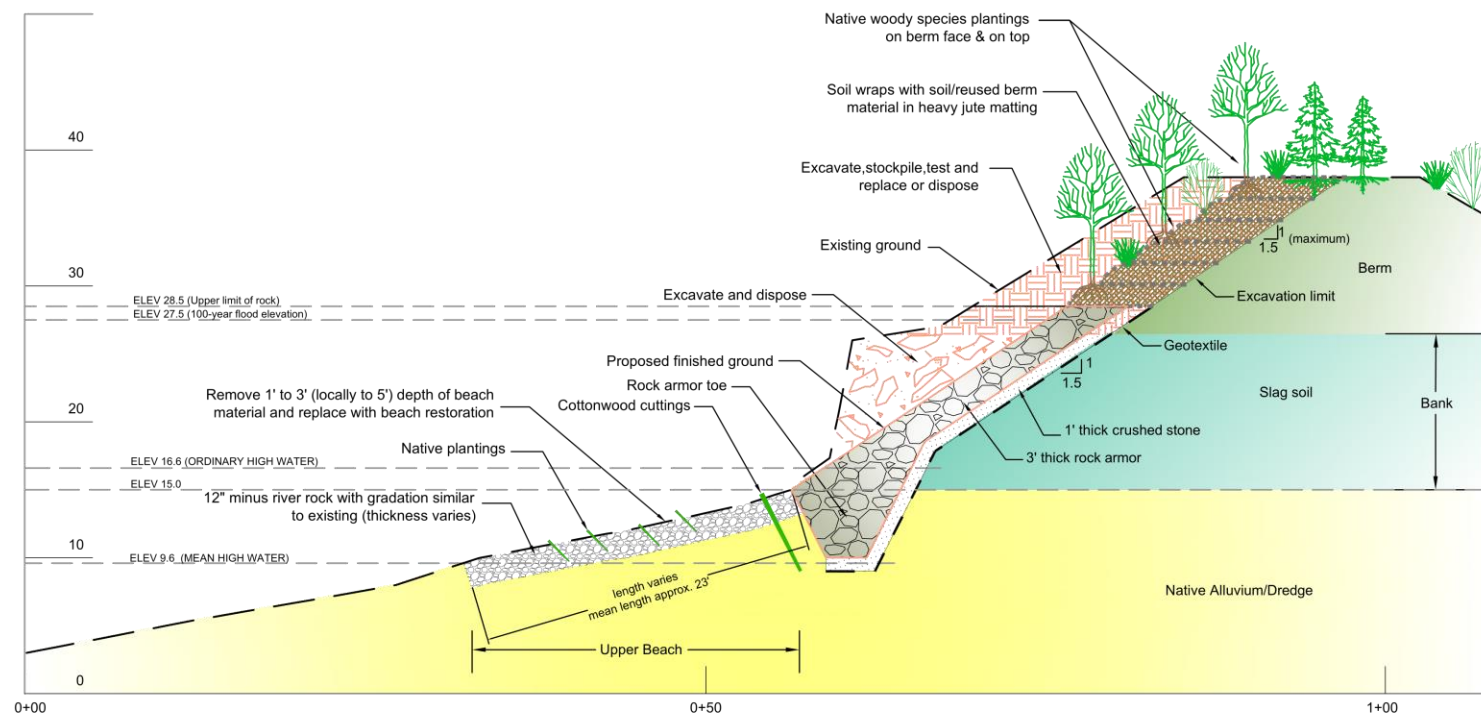
# Figures



**Figure 1.**  
 Topographic/Location Map  
 EVRAZ Oregon Steel  
 Portland, OR

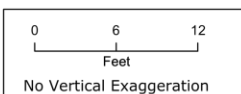






#### NOTES:

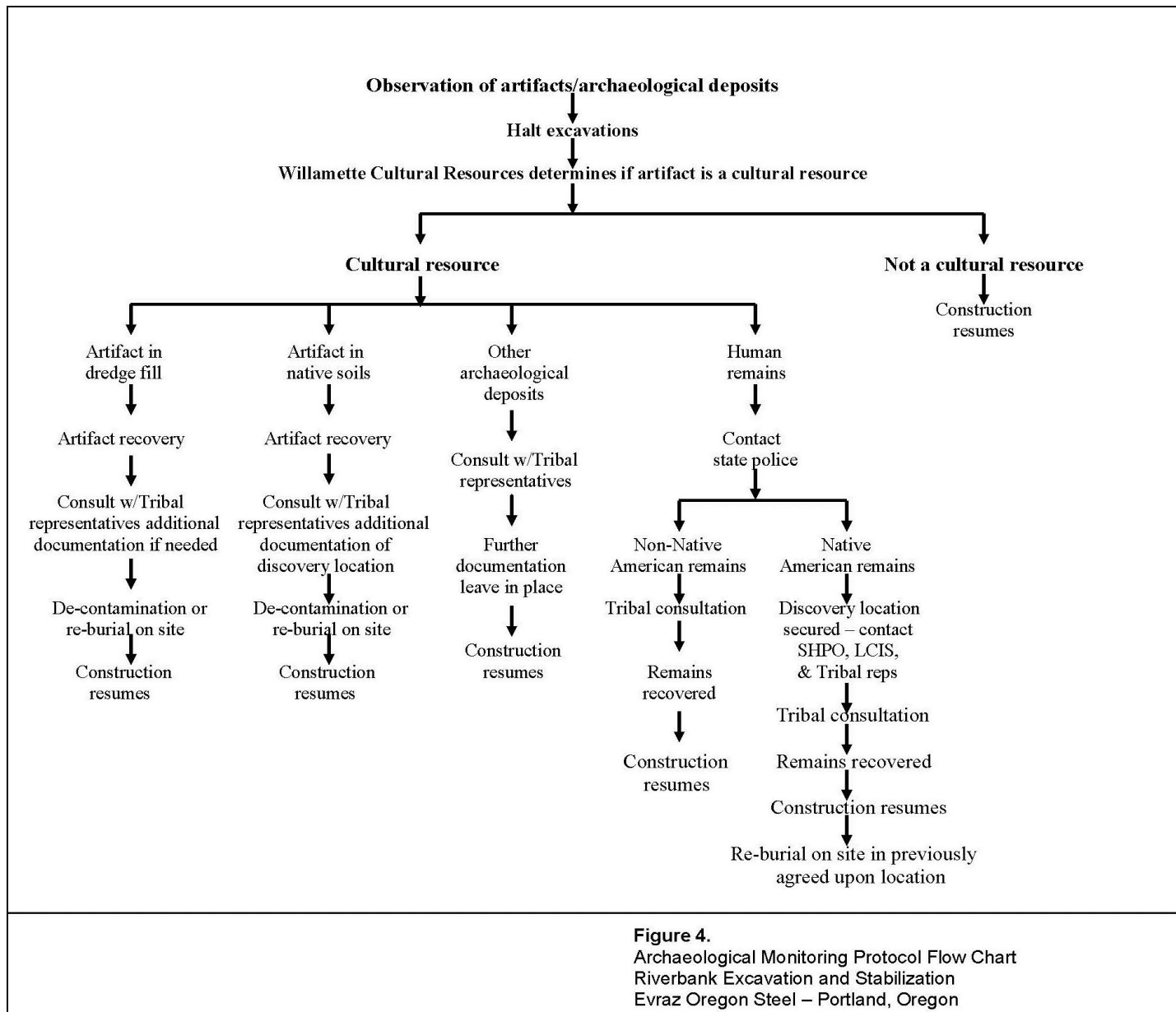
1. VERTICAL DATUM IS NGVD29 (FEET)
2. DEQ ESTABLISHED A REFERENCE ELEVATION FOR MHW OF 9.6ft NGVD 29 (8ft COLUMBIA RIVER DATUM).



Adapted from Revised Basis of Design/Conceptual Design  
for Upper Beach and Riverbank Interim Action, Evraz  
Oregon Steel, Portland, OR. AECOM and Integral, 2013

**Figure 3.**  
Riverbank Conceptual Design  
EVRAZ Oregon Steel  
Portland, OR





## **Attachment A**

### **Contact Information for Archaeological Monitoring Protocol**

**Attachment A**  
**Contact Information for Archaeological Monitoring Protocol**  
**Riverbank Excavation and Stabilization Project**  
**Evraz Oregon Steel, Portland, Oregon**

Tribe/Agency	Contact Name	Email Address	Phone Number
Integral Consulting	Linda Baker	lbaker@integral-corp.com	206-957-0314
Integral Consulting	Jane Sund	jsund@integral-corp.com	503-943-3615
Integral Consulting	Craig Heimbucher	cheimbucher@integral-corp.com	503-978-6189
EOS	Drew Gilpin	gilpina@osm.com	503-978-6189
Oregon DEQ	Jennifer Sutter	Sutter.jennifer@deq.state.or.us	503-229-6148
US Army Corps	Michael Ladouceur	Michael.a.ladouceur@usace.army.mil	503-808-4337
WillametteCRA	David Ellis	davee@willamettecra.com	503-281-4576
	Todd Ogle	todd@willamettecra.com	503-281-4576
	Kanani Paraso	Kanani@willamettecra.com	503-281-4576
SHPO	Dennis Griffin	Dennis.griffin@state.or.us	503-986-0674
Oregon State Police	Sgt. Chris Allori		503-731-3027 503-708-6461 (cell)
Multnomah County Medical Examiner		medical.examiner@multco.us	503-823-3333
Commission on Indian Services	Karen Quigley	Karen.quigley@state.or.us	503-986-1068
Grand Ronde	David Harrelson	david.harrelson@grandronde.org	503.879.2320
Siletz	Robert Kentta	rkentta@ctsi.nsn.us	541-444-8244
Warm Springs	Kathleen Sloan	kathleen.sloan@ctwsbnr.org	541-553-3464
	Roberta Kirk		541-553-3464
Umatilla	Teara Farrow	tearafarrow@ctuir.com	541-276-3447
	Catherine Dickson	catherinedickson@ctuir.com	541-276-3447
Yakima	Johnson Meninick	Johnson@yakama.com	509-865-7203
Nez Perce	Keith "Pat" Baird	Keithb@nezperce.org	208-621-3851